

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

RICKI RICKALINE GIBBS,

Defendant.

INFORMATION

25 Cr. 322-KMK

COUNT ONE
(Conspiracy to Commit Wire Fraud)

The United States Attorney charges:

1. From at least in or about 2019 through at least in or about 2023, in the Southern District of New York and elsewhere, RICKI RICKALINE GIBBS, the defendant, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343.

2. It was a part and an object of the conspiracy that RICKI RICKALINE GIBBS, the defendant, and others known and unknown, knowingly having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343, to wit, GIBBS, using interstate and international phone calls and emails, among other means, agreed to make and caused to be made false statements to victims falsely representing that the victims had won prizes in a sweepstakes and needed to transfer money, including by interstate wire transfers, to

pay for taxes and fees necessary to claim their purported prizes, when, in truth and in fact, the victims had not won any sweepstakes prizes and, thereafter, GIBBS and others misappropriated these victims' funds.

(Title 18, United States Code, Sections 1349.)

FORFEITURE ALLEGATION

3. As a result of committing the offense alleged in Count One of this Information, RICKI RICKALINE GIBBS, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(8), any and all real or personal property used or intended to be used to commit, to facilitate, or to promote the commission of said offense; and any and all real or personal property constituting, derived from, or traceable to the gross proceeds that the defendant obtained directly or indirectly as a result of said offense including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.


SUBSTITUTE ASSET PROVISION

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)


JAY CLAYTON
United States Attorney